Document Log Item

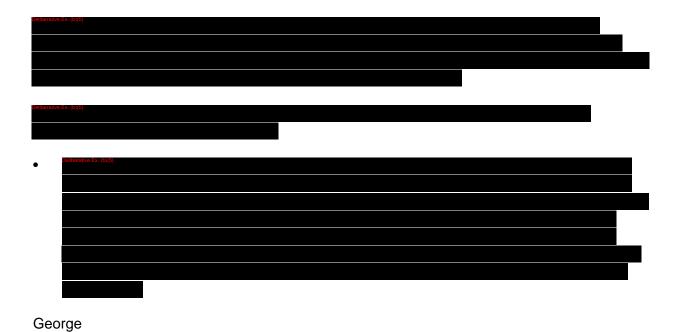
Addressing			
From		То	
George Robin/R9/USEPA/US		Adam Freedman/R9/USEPA/US@EPA Adam Freedman/ R9/USEPA/US	
сс		BCC	
Nancy Rumrill/R9/USEPA/US@EPA			
Description			Form Used: Reply
Subject		Date/Time	
(Shell)Re:CO2 Injection Well - State Primacy		09/09/2009 03:17 PM	
# of Attachments	Total Bytes	NPM	Contributor
0	10,882		
Processing			
Comments			

Body

Document Body

Adam, here are my thoughts:





Adam Freedman---09/09/2009 02:31:12 PM---Nancy and George-- There

From: Adam Freedman/R9/USEPA/US

To: George Robin/R9/USEPA/US@EPA, Nancy Rumrill/R9/USEPA/US@EPA

Date: 09/09/2009 02:31 PM

Subject: Fw: CO2 Injection Well - State Primacy

Nancy and George--



-Adam

---- Forwarded by Adam Freedman/R9/USEPA/US on 09/09/2009 02:28 PM -----

From: "Chan, Victor M." < VMChan@SolanoCounty.com>

To: Adam Freedman/R9/USEPA/US@EPA

Cc: "Bell, Jeffery" <JBell@solanocounty.com>, "Leland, James H." <JHLeland@SolanoCounty.com>,

"Profant, Michael E." <MEProfant@SolanoCounty.com>, "Cliche, David W."

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"Laughlin, James W." <JWLaughlin@SolanoCounty.com>

Date: 09/09/2009 01:51 PM

Subject: CO2 Injection Well - State Primacy

Adam

We had a planning meeting on the CO2 Injection Well this morning. You should be aware that there may be some conditions with the Solano County's Use Permit.

One issue that came up during today's meeting is about jurisdiction and enforcement on this relatively new program.

According to the EPA homepage on state primacy located at: http://www.epa.gov/safewater/uic/primacy.html The State of California is a "joint primacy state" for the UIC program which need clarification. I also have the following questions for the US EPA:

- 1. Once you issue your EPA permit, who is responsible for enforcement of the EPA's permit conditions? (i.e. will EPA enforce the permit conditions or is enforcement delegated to California?)
- 2. Will your EPA permit invoke the "proposed" EPA requirements for Geological Sequestration of CO2 (EPA 816-F-08-032) that is now undergoing public review?
- 3. Can I get a DRAFT of your EPA permit? I would like to coordinate the EPA's requirements with the county requirements to ensure no conflict, avoid duplication and ensure completeness.

Victor M Chan, PE, BCEE
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Board Certified Environmental Engineer www.aaee.net
707-784-3177